



Brian M. McClendon
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February 14, 2019

Sent via e-mail to: siera.griffin@oig.dot.gov

Siera Griffin
Government Information Specialist
U.S. Department of Transportation-Office of Inspector General
1200 New Jersey Avenue SE, 7th Floor
Washington, D.C. 20590

**RE: Freedom of Information Act Request, Control No.: FI-2019-0021.
Our File No.: 17.128**

Dear Siera:

On February 12, 2019, we received your response to our Freedom of Information Act ("FOIA") request, dated December 3, 2018, sent to the U.S. Department of Transportation ("DOT") Office of Inspector General ("OIG"). Specifically, we requested:

"copies of any and all public records addressing, describing, documenting, or discussing Colonial Pipeline Company's ("Colonial"):

1. September 9, 2016 "Pelham Pipeline Spill" designated by PHMSA as Case No. CPF 2-2016-5005H;
2. October 31, 2016 "Colonial Pipeline Explosion" in Helena, Alabama..."

On January 28, 2019, you contacted us via email requesting that we narrow the scope of our request to the Report of Investigation, which would to allow the DOT OIG FOIA office to process the request in a more expeditious manner. On January 28, 2019, we agreed to receive the Report first and if additional information was needed we would issue a follow up request. After reviewing the DOT OIG Report of Investigation, we believe additional information is necessary.

This supplemental request includes, but is not limited to, all attachments identified in the Report of Investigation, all documents referenced in the Report of Investigation (e.g. 1,600 pages of e-mails and attachments and the 10,368 megabytes of documents produced by Colonial) and all communications (e.g. e-mails, text messages, letters, facsimiles, share files, etc.). Additionally, I wish to include any and all records relating to the recoat work or

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the leak submitted directly by Colonial or by any-third party representatives, such as an engineering firm or law firm including, but not limited to, the following: Terracon Consulting Engineers, Butler Snow, Hunton & Williams, Troutman Sanders and Alston Bird, regardless of whether such documents were referenced in the Report itself.

Please provide the requested information in electronic format, preferably in Optical Character Recognition "Portable Document Format" ("OCR PDF").

If it is your position that the file, or portions thereof, associated with this request is exempt from disclosure, please state the basis of the denial of each portion of the record withheld. In addition, please provide the nonexempt portions of the record. We believe this requested information is not exempt from mandatory disclosure under FOIA; however, should DOT OIG determine that any responsive records contain information which is exempt from public release, please provide copies of "reasonable segregable," i.e. redacted, portions of such records, pursuant to 5 U.S.C. § 552(b).

In the event that the cost of copying and producing the above-mentioned files exceeds \$500.00, please contact me for approval before fulfilling the FOIA request.

If you have questions at any time, please do not hesitate to give me a call at (205) 967-8822 or at bmcclendon@lgwmlaw.com

Thank you very much for your consideration in this matter.

Very truly yours,
Brian M. McClendon
Brian M. McClendon

BMM/sth